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6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 Patricia A. Ramsey,
9 Plaintiff,

10 vs.

11 P.F. Chang's China Bistro, Inc.; Does I through
12 X, inclusive; and Roe Business Entities XI
through XX, inclusive,

13 Defendant.

14 Case No.: 2:20-cv-2207

15 **P.F. Chang's China Bistro, Inc. Petition for
Removal**

16 P.F. Chang's China Bistro, Inc. petitions to remove this case to the United States District
17 Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada.
18 This petition for removal is signed per Rule 11.

19 Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per 28
20 U.S.C. 1332. Plaintiff alleges she is a resident of Nevada.¹ P.F. Chang's China Bistro, Inc. is a
21 Delaware entity with its principal place of business in Arizona.

22 Plaintiff alleges injury from a fall on November 24, 2018.² The complaint was filed on
23 November 12, 2020.³ Before suit was filed, Plaintiff sent a letter to P.F. Chang's alleging it was
24 negligent and caused her injuries that required treatment costing \$149,062.43.⁴ P.F. Chang's timely
25 petitioned for removal within 30 days of being served with the complaint.

26

27 ¹ ECF No. 1-2 at ¶ 1.

28 ² *Id.* at ¶ 8.

³ ECF No. 1-2.

⁴ ECF No. 1-3.

1 Attached to this petition are copies of all process, pleadings, and orders served upon P.F.
2 Chang's in the state court action.

3 DATED this 7th day of December, 2020.



100 */s/ Michael P. Lowry*
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CERTIFICATE OF SERVICE

100 Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman &
Dicker LLP, and that on December 7, 2020, I served **P.F. Chang's China Bistro, Inc's Petition for
Removal** as follows:

100 by placing same to be deposited for mailing in the United States Mail, in a sealed
150 envelope upon which first class postage was prepaid in Las Vegas, Nevada;
100 via electronic means by operation of the Court's electronic filing system, upon each
150 party in this case who is registered as an electronic case filing user with the Clerk;

100 Christiansen Law Offices
810 S. Casino Center Blvd., Suite 104
150 Las Vegas, NV 89101

100 BY: */s/ Michael P. Lowry*
150 An employee of:

